

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

OLIVIA ESTRADA,)	
)	
Plaintiff,)	Case No.: 08 C 0225
)	
-vs-)	Judge Castillo
)	
NCO FINANCIAL SYSTEMS, INC.)	Magistrate Judge Brown
)	
Defendant.)	

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO ANSWER COMPLAINT**

NOW COMES the Defendant, NCO FINANCIAL SYSTEMS, INC., (“NCO”), by and through undersigned counsel, and for its Unopposed Motion for Extension of Time to Answer Complaint, states as follows:

1. Plaintiff has brought this action pursuant to the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. §1692 *et seq.*, generally alleging that Defendant engaged in certain unlawful activities in an effort to collect a debt from Plaintiff.
2. The deadline for Defendant to file a pleading responsive to Plaintiff’s Complaint is March 24, 2008.
3. Since being served with the Complaint, Defendant has been attempting to identify the collection account of Plaintiff. However, due to the number of persons with names similar or identical to Plaintiff, Defendant has not been able to identify the account to date.

4. Defendant cannot meaningfully respond to the allegations of Plaintiff's Complaint until the account is identified and the collection activity account notes are reviewed.

5. Plaintiff's counsel is currently attempting to ascertain additional identifying information so that this account can be located by Defendant.

6. Defendant requests an extension of fifteen (15) days, until April 8, 2008 within which time Defendant will answer or otherwise plead.

7. Plaintiff's counsel has been afforded an opportunity to review this motion, and has no objection to the relief being sought.

8. This motion is not being brought to annoy or harass any party, or to unnecessarily delay the prosecution of this action. The additional time is needed for Defendant to identify the account, evaluate the claim and respond in a meaningful manner to Plaintiff's Complaint.

WHEREFORE, Defendant NCO respectfully prays that this Honorable Court enter an order granting Defendant an enlargement of time, up to and including April 8, 2008 to file a responsive pleading to Plaintiff's Complaint.

Respectfully Submitted,

By: /s/ James K. Schultz
James K. Schultz

James K. Schultz
SESSIONS, FISHMAN, NATHAN & ISRAEL OF ILLINOIS, LLC
1000 Skokie Boulevard, Suite 430
Wilmette, IL 60091
Telephone: (847) 853-6100
Facsimile: (847) 853-6105
E-Mail: jschultz@sessions-law.biz

Of Counsel:

David Israel
SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.P.
Lakeway Two, Suite 200
3850 North Causeway Boulevard
Metairie, LA 70002-7227
Telephone: (504) 828-3700
Facsimile: (504) 828-3737
E-Mail: disrael@sessions-law.biz

Attorneys for Defendant, NCO FINANCIAL SYSTEMS, INC.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

OLIVIA ESTRADA,)	
)	
Plaintiff,)	
)	Case No.: 08 C 0225
-vs-)	
)	Judge Castillo
NCO FINANCIAL SYSTEMS, INC.)	
)	Magistrate Judge Brown
Defendant.)	

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of March, 2008, a copy of the foregoing **DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER COMPLAINT** was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Timothy J. Sostrin
LEGAL HELPERS, P.C.
20 West Kinzie Street, Suite 1300
Chicago, Illinois 60610
(866) 339-1156

/s/ James K. Schultz
James K. Schultz

James K. Schultz
SESSIONS, FISHMAN, NATHAN & ISRAEL OF ILLINOIS, LLC
1000 Skokie Boulevard, Suite 430
Wilmette, IL 60091
Telephone: (847) 853-6100
Facsimile: (847) 853-6105
E-Mail: jschultz@sessions-law.biz